



Morecambe Town Council
Morecambe Town Hall
Marine Road
Morecambe
LA4 5AF.

Contact: David Croxall
Telephone: 01524 422929
Email: clerk@morecambe.gov.uk
Our Ref:
Your Ref: 17/00309/FUL

Mr A. Dobson,
Head of Regeneration and Policy,
Lancaster City Council,
Town Hall
Morecambe,
LA4 5AF

26th July, 2017

Dear Mr Dobson,

Re: Planning Application No. 17/00309/FUL - Land at Vale of Lune RUFC, Powderhouse Lane Lancaster for the erection of 51 dwellings

The Town Council considered the above its meeting on 20th July decided to object to this Application. I therefore set out for your consideration the reasons for the Town Council's objection to this application below for your consideration:

1. The application is not in accordance with the land classification as set out in Lancaster City Council's Strategic Housing Land Assessment.

The area proposed for development is shown on Map 9 Torrisholme which is on Pages 1. and 2. of the S.H.L.A.A. Maps. Areas 280 and 262 on Map 1 refer to the area proposed for development and are indicated as undeliverable thus giving an indication that these areas do not form a part of the L.C.C. Housing Land Allocation. In addition, the shading on Map 9 Torrisholme on Page 2, shows that the land under application is allocated as a Nature Improvement Area which is entirely in accordance with its proximity to the area of Green Belt.

2. The application is not in accordance with Development Management Policy 24 in the review of the DPD Development Management Policy 24 (DM 24) Open Space, Recreational Facilities.

This policy is concerned with the protection of Open Space. In the first paragraph, the policy states "Should the Council accept that exceptional circumstances exist in relation to the re-use or re-development of open space, high quality re-provision will be required which provides equal or better provision than currently exists."

Morecambe Town Council believes no exceptional circumstances have been demonstrated.

The second paragraph clearly states that "... the Council will only consider the loss of open space where it has been clearly demonstrated, via consultation with the local community that the land in question no longer has an economic, environmental or community value." The paragraph further states "Proposals which involve the loss of open space will need to be accompanied by a full open space assessment in accordance with Para 74 of the N.P.P.F."

Morecambe Town Council is of the view that no consultation with the local community has taken place and no assessment has been carried out in accordance with the N.P.P.F.

3. The Town Council believes that the drainage management strategy increases an already proven flood risk to houses adjacent to The Way.

A drainage strategy has been prepared for the developer and the proposed drainage strategy is outlined in Section 3 of that strategy. Paragraph 3.2 states "... if drainage cannot be achieved through infiltration the preferred option... a controlled discharge to a local water body or watercourse. Paras 3.5, 3.6 and 3.7 refer to such a watercourse. Para 3.7 states "The surface water discharge is to be controlled to pre-development runoff rates allowing surface water runoff generated by all rainfall events up to the 100 year critical rain storm."

The watercourse in question runs within Morecambe Town Council boundaries and alongside properties situated along the public footpath known as The Way. That watercourse has overflowed within the last twelve months and consequent flooding of those properties has occurred well outside the parameters of the stipulated 1 in 100 year critical rain storm. It follows that if surface water discharge is to be controlled to pre-development rates then flooding may well re-occur.

The assessment states in Paragraph 4.2 "...drainage will be constructed, appropriately sized to take all surface water runoff from the new buildings and hardstanding areas..."

Morecambe Town Council anticipates that this allowance for surface water runoff will not remain appropriate for long. It is well-recognized that the tendency is for householders to increase hardstanding over time to allow for increased car parking and often to avoid the necessity for the maintenance of soft landscape areas. Such easily anticipated change will lead to an increase in runoff rates and the concomitant risk of the watercourse overtopping.

In conclusion, Morecambe Town Council believes the proposed development is not supported by Lancaster City Council's Strategic Housing Land Availability assessment and does not comply with Policy DM 24 of Lancaster City Council's Development Plan Document. Morecambe Town Council further believes that the proposed drainage strategy makes inadequate provision for anticipated surface runoff through reliance on an existing watercourse which already overtops in severe rain with consequent flooding of properties adjacent to the watercourse.

I have noticed on your website today that the Application has now been withdrawn. However, given that the Council made this decision I believe I should still forward this objection to you and request that it be included on your website alongside the other comments received.

Thank you

Yours sincerely,



David Croxall
Town Clerk